



CHRISTOPHER E. BUCKEY
PARTNER
DIRECT: (518) 788-9406
CBUCKEY@CULLENLLP.COM

June 21, 2024

VIA ECF-PACER

Judge Miroslav Lovric
United States District Court, Northern District of New York
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, New York 13901

Re: *Adirondack Trust Company v Maha Laxmi Corp., et al.*,
1:21-cv-01334-DNH-ML (N.D.N.Y.)

Dear Magistrate Judge Lovric:

This firm represents Plaintiff Adirondack Trust Company (“ATC”) in the above-captioned action. Pursuant to the Court’s directives at the June 17, 2024 hearing and its June 18, 2024 Text Order (Dkt. 95), I write to the Court with the consent of William Nolan and Jennifer Thomas, counsel for Defendants in this action, to provide a joint status report.

The parties met and conferred via email on June 21, 2024 and have agreed to the following proposed schedule for this matter:

- August 8, 2024: ATC will serve a supplemental privilege log and any supplemental production in accordance with the Court’s directives at the June 17, 2024 hearing;
- October 31, 2024: Parties will complete all fact discovery (paper, party and non-party depositions);
- October 31, 2024: ATC will serve its supplemental forensic accounting expert disclosure, if any;
- October 31, 2024: Defendants will serve their expert damages disclosure, if any;
- December 6, 2024: Defendants will serve their amended/supplemental forensic accounting expert disclosure, if any;
- December 6, 2024: ATC will serve its expert damages disclosure, if any;
- January 10, 2025: ATC will serve its rebuttal forensic accounting expert disclosure, if any;



January 10, 2025: Defendants will serve their rebuttal expert damages disclosure, if any;

February 28, 2025: Parties will complete expert discovery; and

April 4, 2025: Deadline for filing dispositive motions.

Please contact me if the Court has any questions.

Respectfully,

Christopher E. Buckey

cc: All Counsel of Record (via ECF-PACER)